Case 3:12-cr-00374-N Document 1 Filed 11/07/12 RESETTED 1

IN THE UNITED STATES DISTRICT COURT OF TEXAS

DALLAS DIVISION

CLERK, U.S. DISTRICT COURT Deputy

Deputy

LINITED STATES OF AMERICA CLERK STATES OF THE PRINTED S

UNITED STATES OF AMERICA § FILED UNDER SEAL

v. § No.

GLEN MURRAY MCDONALD (1) § I 2CR - 374 - N

INDICTMENT

The Grand Jury Charges:

Count One
Trafficking in Contraband Cigarettes
(Violation of 18 U.S.C. § 2342(a))

On or about April 10, 2012, in the Northern District of Texas, and elsewhere, the defendant, **Glen Murray McDonald**, did knowingly transport, receive, possess, and purchase contraband cigarettes, as that term is defined in 18 U.S.C. § 2341, to wit: a quantity of more than 10,000 cigarettes, which bore no evidence of the payment of applicable state cigarette taxes in the State of Texas.

In violation of 18 U.S.C § 2342(a).

Count Two Receipt of Counterfeit Securities (Violation of 18 U.S.C § 2315)

On or about April 10, 2012, in the Northern District of Texas, and elsewhere, the defendant, **Glen Murray McDonald**, did knowingly and unlawfully receive and possess counterfeited tax stamps; namely more than 130,000 State of Texas tax stamps, moving as, and which were a part of, and which constituted interstate commerce, knowing the same to have been falsely made and counterfeited.

In violation of 18 U.S.C. § 2315.

Forfeiture Notice (18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c); 49 U.S.C. § 80303 and 28 U.S.C. § 2461(c))

Upon conviction for either of the offenses alleged in Counts One and Two of this Indictment and pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), the defendant, **Glen Murray McDonald**, shall forfeit to the United States of America all property constituting or derived from proceeds traceable to the respective offense.

Additionally, upon conviction for the offense alleged in Count One of this Indictment and pursuant to 49 U.S.C. § 80303 and 28 U.S.C. § 2461(c), the defendant, Glen Murray McDonald, shall forfeit to the United States of America any aircraft, vehicle, or vessel involved in the offense.

The property subject to forfeiture includes, but is not limited to, the following:

a. The proceeds traceable to the commission of the offense, concerning Counts One and Two, in the form of a money judgment against the defendant.

Pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 982(b)(1), if any of the property subject to forfeiture, as a result of any act or omission of the defendant, cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third person; has been placed beyond the jurisdiction of the court; has been substantially diminished in value; or has been commingled with other property which cannot be subdivided without difficulty, it is the intent of the United States of America to seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture.

A TRUE BILL

FOREPERSON

SARAH R. SALDAÑA UNITED STATES ATTORNEY

KATHERINE E. PFEIFLE

Assistant United States Attorney

Texas Bar No. 24041912

1100 Commerce Street, Third Floor

Dallas, Texas 75242-1699 Telephone: 214.659.8693

Fax: 214.659.8805

JOHN J. BOYLE

Assistant United States Attorney

Texas Bar No. 00790002

1100 Commerce Street, Third Floor

Dallas, Texas 75242-1699 Telephone: 214.659.8617

Fax: 214.659.8809

JOHN J. DELAGARZA III

Assistant United States Attorney

Texas State Bar No. 00796455

1100 Commerce Street, Third Floor

Dallas, Texas 75242-1699 Telephone: 214.659.8600

Fax: 214.659.8805

Email: john.delagarza@usdoj.gov

IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

THE UNITED STATES OF AMERICA

v.

GLEN MURRAY MCDONALD

SEALED INDICTMENT 12CR - 374 - N

18 U.S.C. § 2342 (a) Trafficking in Contraband Cigarettes

18 U.S.C. § 2315 Receipt of Counterfeit Securities

18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c); 49 U.S.C. § 80303 and 28 U.S.C. § 2461(c) Forfeiture Notice

2 Counts

A true bill rendered	ander L. Tueste
DALLAS	FOREPERSON
Filed in open court this day of November 2012	
	Clerk
Issue Arrest Warrant for GLEN MURRAY MCDONALD	11/7/12
UNITED STATES DISTRICT/MAGISTRATE JUDGE No Criminal matter pending	